

Exhibit 2

Mitchell Nobel

From: Greenfield, Elliot <egreenfield@debevoise.com>
Sent: Thursday, July 14, 2022 5:59 PM
To: 'Maya Jumper'; Niraj Thakker
Cc: Tether Litigation; Ceresney, Andrew J.; Schaper, Michael; O'Connor, Maeve; Burke, Melanie; Schlegelmilch, Stephan J; sahuja@dmablaw.com; cbeal@dmablaw.com; michael@mjllaw.com; Bill Kraus; Rosh, Samuel; Hahn, Ashley V.
Subject: RE: In re Tether and Bitfinex Crypto Asset Litig., No. 19-CV-09236
Attachments: Discovery Ltr to K Roche 7-14-22 with attachment.pdf

[EXTERNAL SENDER]

Maya,

Please see attached and let us know if you would like to discuss.

Thanks,
Elliot

**Debevoise
& Plimpton**

Elliot Greenfield
Partner

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From: Maya Jumper [<mailto:mjumper@rochefreedman.com>]
Sent: Tuesday, July 12, 2022 16:00
To: Niraj Thakker; Greenfield, Elliot
Cc: Tether Litigation; Ceresney, Andrew J.; Schaper, Michael; O'Connor, Maeve; Burke, Melanie; Schlegelmilch, Stephan J; sahuja@dmablaw.com; cbeal@dmablaw.com; michael@mjllaw.com; Bill Kraus; Rosh, Samuel; Hahn, Ashley V.
Subject: Re: In re Tether and Bitfinex Crypto Asset Litig., No. 19-CV-09236

Elliot,

We ask that you provide the B/T Defendants' position in response to Sections I & II of Plaintiffs' July 7, 2022 letter by Thursday, July 14, 2022 in order to advance the discovery process. Should disputes remain with respect to Section III of the letter, we are available to meet and confer later this week.

Thanks,

Maya S. Jumper

Associate

Roche Freedman LLP

99 Park Avenue, Suite 1910

New York, New York 10016

(t) (646) 970-7524

(@) mjumper@rochefreedman.com

From: Niraj Thakker <nthakker@rochefreedman.com>

Date: Thursday, July 7, 2022 at 6:09 PM

To: Greenfield, Elliot <egreenfield@debevoise.com>

Cc: Maya Jumper <mjumper@rochefreedman.com>, Tether Litigation

<Tether_Litigation@rochefreedman.com>, Ceresney, Andrew J. <aceresney@debevoise.com>, Schaper,

Michael <mschaper@debevoise.com>, O'Connor, Maeve <mloconnor@debevoise.com>, Burke, Melanie

<mburke@debevoise.com>, Schlegelmilch, Stephan J <sjschlegelmilch@debevoise.com>,

sahuja@dmablaw.com <sahuja@dmablaw.com>, cbeal@dmablaw.com <cbeal@dmablaw.com>,

michael@mjllaw.com <michael@mjllaw.com>, Bill Kraus <krausw@butzel.com>, Rosh, Samuel

<sjrosh@debevoise.com>, Hahn, Ashley V. <avhahn@debevoise.com>

Subject: RE: In re Tether and Bitfinex Crypto Asset Litig., No. 19-CV-09236

Counsel:

Please see attached.

Thank you,
Niraj Thakker

From: Daniel Stone <dstone@rochefreedman.com>

Sent: Wednesday, July 6, 2022 2:19 PM

To: Greenfield, Elliot <egreenfield@debevoise.com>

Cc: Maya Jumper <mjumper@rochefreedman.com>; Tether Litigation <Tether_Litigation@rochefreedman.com>;

Ceresney, Andrew J. <aceresney@debevoise.com>; Schaper, Michael <mschaper@debevoise.com>; O'Connor, Maeve

<mloconnor@debevoise.com>; Burke, Melanie <mburke@debevoise.com>; Schlegelmilch, Stephan J

<sjschlegelmilch@debevoise.com>; sahuja@dmablaw.com; cbeal@dmablaw.com; michael@mjllaw.com; Bill Kraus

<krausw@butzel.com>; Rosh, Samuel <sjrosh@debevoise.com>; Hahn, Ashley V. <avhahn@debevoise.com>

Subject: Re: In re Tether and Bitfinex Crypto Asset Litig., No. 19-CV-09236

Hi Elliot,

We are available any time after noon on Friday. Please circulate a dial-in for a time that works on your end.

Thanks,

Daniel M. Stone

Associate

Roche Freedman LLP

99 Park Avenue, 19th Floor

New York, NY 10016

(t) (646) 506-9375

(m) (203) 962-2885

(@) dstone@rochefreedman.com

From: Greenfield, Elliot <egreenfield@debevoise.com>
Date: Tuesday, July 5, 2022 at 3:03 PM
To: Daniel Stone <dstone@rochefreedman.com>
Cc: Maya Jumper <mjumper@rochefreedman.com>, Tether Litigation <Tether_Litigation@rochefreedman.com>, Ceresney, Andrew J. <aceresney@debevoise.com>, Schaper, Michael <mschaper@debevoise.com>, O'Connor, Maeve <mloconnor@debevoise.com>, Burke, Melanie <mburke@debevoise.com>, Schlegelmilch, Stephan J <sjschlegelmilch@debevoise.com>, sahuja@dmablaw.com <sahuja@dmablaw.com>, cbeal@dmablaw.com <cbeal@dmablaw.com>, michael@mjllaw.com <michael@mjllaw.com>, Bill Kraus <krausw@butzel.com>, Rosh, Samuel <sjrosh@debevoise.com>, Hahn, Ashley V. <avhahn@debevoise.com>
Subject: Re: In re Tether and Bitfinex Crypto Asset Litig., No. 19-CV-09236

[EXTERNAL SENDER]

Thanks, Dan. Are you free for a call on Thursday or Friday to discuss? I don't think we need the full team for this.

Thanks,
 Elliot

Sent from my iPhone

On Jul 1, 2022, at 3:21 PM, Daniel Stone <dstone@rochefreedman.com> wrote:

Elliot,

Below is the table we discussed on our last meet and confer. As we noted at that time, the search terms in green are those which you have already agreed to run hit reports for, the terms in blue are those that we continue to assert need to be run for hits, and the ones in red are those that we are currently not continuing to pursue, but without prejudice to our seeking hit reports on those later in discovery. Also, as noted during our meet and confers, we provide RFPs to which each search term is related (including, at your request, RFPs for the green terms that you had already consented to running a hit report for). As we discussed, the search terms were not drafted using the language of the RFPs, because the exercise of trying to divine what search terms will yield responsive documents is necessarily both narrower and broader than describing the documents to be produced. Additionally, as we discussed, this table should not be used in reviewing documents because even if a document "hits" on a search term for one RFP, but a review shows it is only responsive to another RFP, Defendants are still obligated to produce the document.

Please respond by CoB Tuesday to let us know if you will run the hit reports for the searches below.

Have a happy holiday weekend.

Search Term	Responsive RFPs
audit w/10 Tether	RFP No. 11
Tether w/10 transparency	RFP No. 26
"conflict of interest" or "conflicts of interest"	RFP No. 34

(2016 w/15 hack* OR theft* OR unauthorize* OR transfer* OR stolen) and (reserve* OR redem* or redeem*)	RFP No. 35
"ABT & Trust"	RFP No. 31
260011499	RFP No. 31
"Bank of America" OR BofA	RFP No. 31
898100395306	RFP No. 31
"Bank of Colorado"	RFP No. 31
5701063413	RFP No. 31
"Bank of Montreal"	RFP No. 31
"Bank of New York Mellon" OR "BNY Mellon"	RFP No. 31
BankToTheFuture OR "Bnk to the Future"	RFP No. 31
"Bank of Communications"	RFP No. 31
"Banco Portuges de Investimento"	RFP No. 31
"Bank of the Philippine Islands"	RFP No. 31
2-5486163.306.001	RFP No. 31
Spoldzielczy	RFP No. 31
Kaohsiung	RFP No. 31
230510006385 OR 230509006380	RFP No. 31
Bankinter	RFP No. 31
Caixa	RFP No. 31
0216076478170 OR 0216076477370 OR 0216076476570 OR 0786071416230 OR 0786071414070 OR 0216076111170 OR 0216075956230 OR 0216076490070	RFP No. 31
"Canadian Imperial Bank of Commerce" OR CIBC	RFP No. 31
"CC001006882 5108411" OR "CC001006882 0374016" OR "CC001099702 4464710" OR "CC001099702 4113411" OR "CC001099702 4097513" OR "CC001099702 4210719"	RFP No. 31
Cathay	RFP No. 31
33087700408	RFP No. 31
Citibank OR Citi	RFP No. 31

207112962 OR 207129503 OR 207132333 OR 206618910 OR 207139809 OR 207139817 OR 207134933 OR 207132325 OR 207134958 OR 42024768923 OR 42001787749 OR 42024769061 OR 57457749 OR 9945530933 OR 207108689	RFP No. 31
Deltec	RFP No. 31
"Deutsche Bank"	RFP No. 31
DE78660700240057016801 OR DE51660700240057016802 OR 192057016802	RFP No. 31
"Enterprise Bank"	RFP No. 31
1127548 OR 1241367 OR 1127564 OR 1127177 OR 1127193 OR 1128700 OR 1128727 OR 1127599 OR 1235784 OR 1127652 OR 1127644	RFP No. 31
"First Commercial Bank"	RFP No. 31
20386001075	RFP No. 31
Hwatai	RFP No. 31
3366000005573	RFP No. 31
"HSBC Bank" OR "HSBC Securities" OR Pershing	RFP No. 31
861668 OR 141000147	RFP No. 31
ING	RFP No. 31
"JP Morgan Chase" OR JPMC OR Chase	RFP No. 31
296219550 OR 779558365	RFP No. 31
KGI	RFP No. 31
018580071208	RFP No. 31
"Metropolitan Bank"	RFP No. 31
"Noble Bank"	RFP No. 31
"Pekao Bank"	RFP No. 31
"Sackville Bank and Trust"	RFP No. 31
Santander	RFP No. 31
00080753 OR 10379431 OR 10446319 OR 10446322	RFP No. 31
"Shanghai Pudong Development"	RFP No. 31

"Signature Bank"	RFP No. 31
"Stearns Bank"	RFP No. 31
"Sun Trust"	RFP No. 31
810455498 OR 209364251 OR 1000211769301	RFP No. 31
"Shin Kong"	RFP No. 31
0499128110518	RFP No. 31
Taishin	RFP No. 31
068760022865	RFP No. 31
TCA Investment Bancorp & Trust Company	RFP No. 31
"TD Bank"	RFP No. 31
4350649188	RFP No. 31
"US Bank"	RFP No. 31
"Wells Fargo" OR WF	RFP No. 31
2514680467	RFP No. 31
"@bitfinexed"	RFP No. 35, 48
"Authorized Tokens"	RFP No. 7
"bank account" w/5 (Tether or USDT)	RFP No. 31
"Bitcoin Management Solutions"	RFP No. 47
"Capital International"	N/A
"Capital Treasury"	N/A
"Celsius Network" or Celsius w/5 (invest* or investment*)	RFP No. 69
"Ching Shan"	N/A
"Crypto Capital" OR "Crypto SP. Z.O.O." or "Crypto SP ZOO" OR "Global Trading Solutions"	RFP Nos. 10, 27, 30
"Data Nest"	N/A
"don't have enough" w/5 (Tether OR USDT)	RFP No. 15
"El Salvador" OR Salvadoran	N/A
"Eligible Contract"	N/A
"End of month" or EOM	RFP Nos. 11, 12, 13, 14, 15
"Flash Crash"	RFP Nos. 11, 12, 18, 19, 56, 63
"Friedman LLP"	RFP No. 48
"Galaxy Benchmark"	RFP No. 36
"Galaxy Digital"	RFP No. 36
"Global trading"	RFP No. 27

"Global Transaction Services"	N/A
"Hong Kong"	N/A
"Julius Baer"	N/A
"Jump Trading"	RFP No. 51
"Master Fund LP"	RFP No. 36
"Mega International"	RFP Nos. 3, 14, 31, 32
"Mt. Gox"	RFP No. 56
"new Tether"	N/A
"Noble Markets"	RFP No. 40
"not 1:1"	RFP Nos. 7, 14, 15
"not enough" w/5 (tether or USDT)	RFP Nos. 7, 14, 15
"not tethered" OR un-tethered	RFP No. 54
"Paradise Papers"	RFP No. 52
"Paycase Financial"	N/A
"Potter Ventures"	RFP No. 47
"Price differential"	N/A
"price wall"	N/A
"Prosperity Revenue Merchandising"	N/A
"Quantifying the Effect of Tether"	RFP No. 53
"Schneider Wallace"	N/A
"Selendy" OR SG OR SGE	N/A
"Shyft Network"	RFP No. 43
"Smart Property Solutions"	RFP No. 46
("Tether Authorizer" OR Tether) w/5 authorization	RFP Nos. 5, 7, 13
"Tether Report"	RFP No. 53
("USDT" w/5 (equal* OR equat*)) w/15 (USD OR dollar*)	RFP Nos. 7, 14, 15
"USDT/USD" w/5 "trading pair"	RFP Nos. 11, 12, 13, 16, 17, 18, 19
"Virgin Islands"	N/A
("White paper" w/15 ("USDT" OR Tether OR token*)) w/15 (equat* OR back* OR equal* OR hold OR dollar* OR bank* OR account* OR fiat OR currenc* OR reserve* OR cash)	RFP Nos. 3, 5, 14, 31, 32
"Willy Report" OR "WillyBot"	RFP No. 56
"Article 78"	N/A
"Bitcoin Really Un-Tethered"	RFP No. 54
"bitcoin"	N/A

“cat and mouse”	RFP 10, 12, 31, 47, 66,
“company fund*”	N/A
“Crypto Capital”	RFP Nos. 10, 27, 30
“fully back*” and “fully-back*”	RFP Nos. 7, 14, 15
“Global Trade Solutions” or GTS*	RFP Nos. 27, 60
“investor relation*”	N/A
“not backed”	RFP Nos. 7, 14, 15
“price floor”	RFP Nos. 18, 19, 56
“private address*”	RFP Nos. 37, 63
“realcoin*”	N/A
“Smart Property Solutions” or SPS*	RFP No. 46
("Class action" OR lawsuit) w/5 (Leibowitz OR Goldshtein OR Tether)	N/A
("Off exchange" OR "off-exchange" OR private OR "over-the-counter" or "over the counter" or “OTC”) w/5 (transaction* OR arrangement* OR platform* OR exchange*)	RFP No. 24
("Treasury wallet*" OR "Tether treasury") w/15 Bitfinex w/15 (Tether OR "USDT")	RFP Nos. 72, 74
("1:1" OR “one to one”) w/15 (Stablecoin OR "Stable coin" OR token OR “USDT” OR Tether)	RFP Nos. 7, 14, 15
(“Know Your Customer” OR "know-your-customer" OR KYC OR "anti-money laundering" OR AML) w/15 (polic* OR procedur* OR complian* OR train OR Manual OR Notice)	RFP No. 66
((Account* OR Track* OR monitor* OR maintain*) w/15 (“USDT” OR Tether)) w/15 (dollar* OR bank* OR account* OR fiat OR currenc* OR valu* ORreserve* OR balance OR "commercial paper*")	RFP Nos. 12, 14, 15
(Account* OR Track* OR monitor* OR maintain*) w/15 (“USDT” OR Tether) w/15 (issu* OR redeem* OR redemption*)	RFP Nos. 12, 14, 15

(Agreement* OR contract*) w/25 (Bittrex OR Polo!)	RFP No. 60
Urriola OR (Ana w/2 Pan)	RFP No. 39
((Bolívar w/2 Jose) w/2 Gonzalez) OR (Bolívar w/2 Gonzalez)	RFP No. 39
(Bump* OR Crash* OR Drop* OR Jump* OR Spike* OR Floor) w/15 (price OR value OR Bitcoin OR BTC)	RFP No. 18, 19, 56, 63
(Burn* OR giv* OR destroy*) w/15 ("USDT" OR Tether OR token)	RFP Nos. 6, 11
(Data OR email) w/5 host* w/15 (polic* OR procedur* OR complian* OR train* OR Manual OR Notice)	RFP No. 68
(Document OR email) w/5 (retain or retention) w/15 (polic* OR procedur* OR complian* OR train* OR Manual)	RFP No. 77
(Investigat* OR inquir* OR Finding* OR report* OR case* OR audit*) w/15 ("New York AG" OR "New York Attorney General" OR "NY Attorney General" OR NYAG OR "NY AG" OR "Commodities Futures Trading Commission" OR CFTC OR (Dep* w/2 Justice) OR DOJ or "Exchange Commission" OR SEC	RFP Nos. 1, 2
(Guarant* OR promis* OR assur*) w/15 ("1:1" OR "one to one" OR "1-1" OR tethered OR redeem* OR exchang*)	RFP Nos. 7, 14, 15
(Hamid w/2 Reza) OR (Hamid w/2 Khoyi)	RFP No. 46
(Inflat* OR capitaliz* OR spik* OR manipul* OR stabiliz* OR floor OR return* OR Solven* OR use*) w/15 (bitcoin OR demand OR market* OR customer* OR price* OR valu*)	RFP No. 18
(Ivan w/2 (Manuel OR Molina OR Lee)	RFP No. 39
(mov* OR manipul*) w/10 (price OR Market)	RFP No. 18

(Print* OR issu* OR creat*) w/15 ("USDT" OR Tether OR token)	RFP Nos. 4, 5, 59, 61, 62
(Raise* OR request*) w/5 (prospectus* OR "private placement" OR PPM OR solicit* OR invest*)	RFP Nos. 70, 71
(Redeem* OR redempt*) w/10 ("USDT" or Tether OR token)	RFP No. 6
(Stablecoin OR "Stable coin" OR token OR "USDT" OR Tether) w/15 (equat* OR back* OR equal* OR hold*) w/25 (dollar* OR bank* OR account* OR fiat OR currenc* OR valu* OR reserve*)	RFP Nos. 16, 17, 18
(support w/3 price) w/3 (bitcoin OR BTC)	RFP No. 63
((Tether OR Bitfinex OR Digfinex) w/15 ("Crypto Capital" OR "Global Trade Solutions")) w/25 reserve* process* OR operat* OR manag*) OR transact* OR fiat* OR currenc*	RFP No. 27
(time OR Coordinat*) w/10 (mint* OR issu* OR Poloniex OR Bittrex OR Reggie OR Fowler)	RFP No. 63
((Track* OR monitor* OR maintain*) w/15 (polic* OR procedur* OR process* OR "manual process")) w/15 ("USDT" OR Tether OR reserv* OR account* OR issu* OR redeem* OR mint*)	RFP Nos. 12, 14, 15
(USDT OR Tether) w/5 address* w/15 (Omni OR Eth* OR Tron OR EOS OR Liquid* OR Algo* OR SLP OR Sol*)	RFP No. 21
@bitfinex	RFP No. 20, 35, 48
@brockpierce	RFP No. 50
1-to-1*	RFP Nos. 7, 14, 15
12cgpFdJVIXbwHbhrA3TuW1EGnL25Zqc3P	RFP No. 28
13vHWR3iLsHeYwT42RnuKYNBoVPrKKZgRv	RFP No. 28

15ovrfyRTbhqeUkgAqAwtscXDASmietmcJ	RFP No. 28
16tg2RJUEPtZooy18Wxn2me2RhUdC94N7r	RFP No. 28
17A16QmavnUfCW11DAApiJxp7ARnxN5pGX	RFP No. 28
17sHnqeQcwvfPneJkmaTBAQEnQN82yi7ye	RFP No. 28
19-cv-09236*	RFP Nos. 16, 17, 18, 19
19-mc-00022*	RFP No. 3
1A6yDZj1241qtGzEeQWRaptxVEhzz5owLP	RFP No. 28
1A9AUhKv6aLrKGAdwMM9aHXECZM9uQivZK	RFP No. 28
1AA6	RFP No. 28
1AA6iP6hrZfYiacfzb3VS5JoyKeZZBEYRW	RFP No. 28
1AanEM2PU6GS7krwxaysKP3scwb3fdioyE	RFP No. 28
1CEZ4sjk7MUt3LSJi7bRvzbMZvGLWKCa1G	RFP No. 28
1Co1dhYDeF76DQyEyj4B5JdXF9J7TtfWWE	RFP No. 28
1DEcTtkrbdXxS1wbrMvzub5X4VpByYmAwo	RFP No. 28
1DUb2YYbQA1jjaNYzVXLZ7ZioEhLXtbUru	RFP No. 28
1F6nNgCTLcR4abWuMs1CHUWYNcnJ47tvbc	RFP No. 28
1Fd3iQDDA6mJVoaV4ZcqqVFe1MX97EZoD	RFP No. 28
1G6jMfQotd6rV8VkMFNx4hPXYHioeBdquf	RFP No. 28
1GjgKbj69hDB7YPQF9KwPEy274jLzBKVlh	RFP No. 28
1H48Bp7EGELgnGSVYKdiCuSo6n822mVmHg	RFP No. 28
1Hi1hyJpUeETGBTQ8aPZ69GBL8xBVV53XP	RFP No. 28
1J1d	RFP No. 28

1J1dCYzS5EerUuJCJ6iJYVPytCMVLXrgM9	RFP No. 28
1J8fgfPwn4dsxLiA5BnUkzHoubPJ6q5q8g	RFP No. 28
1KBXtTQnEgU34xXchwvmAoX7o5qZAp3xF	RFP No. 28
1Kr6QSydW9bFQG1mXiPNNu6WpJGmUa9i1g	RFP No. 28
1KYiKJEfdJtap9QX2v9BXJMpz2SfU4pgZw	RFP No. 28
1LJvsEN9ZzeBVPB4XbhS7mxg99gBAPoMB	RFP No. 28
1LSgEKji3ZoGdvzBgkcJMej74iBd38fySb	RFP No. 28
1MZAayfFJ9Kki2csoYjFVRKHFFSkdoMLtX	RFP No. 28
1N52wHoVR79PMDishab2XmRHsbekCdGquK	RFP No. 28
1NTMakegVwQpMdGxRQnFKyb3G1FAJysSfz	RFP No. 28
1NUyryQe1cQYmqg5bjwWNFXA8T1M6htSQ	RFP No. 28
1PCwER7f57fkPq2kuR9rYV7Wpr1LYvFWsA	RFP No. 28
1Po1oWkD2LmodfkBYiAktwh76vkF93LKnH	RFP No. 28
20-mc-00063*	N/A
20-mc-00446*	N/A
20-mi-00042*	N/A
20-ms-00033*	N/A
3BbDtxBSjgfTRxaBUGR2JACWRukLKtZdiQ	RFP No. 28
3D2oetdNuZUqQHPJmcMDDHYoqkyNVsFk9r	RFP No. 28
3MbYQMMmSkC3AgWkj9FMo5LsPTW1zBTwXL	RFP No. 28
Adam w/2 Chamely	N/A
agree w/15 (flow OR USDT OR Tether OR mint* OR issu* OR Poloniex OR Bittrex OR Reggie OR Fowler)	RFP Nos. 7, 11, 14, 15

AML	N/A
Amy w/2 Churchill	N/A
Anti-money	N/A
Arbitrage	RFP No. 28
Aron w/2 Camponovo	N/A
Artific* /15 (Bitcoin OR Bitcoin Cash OR BTC OR Omni OR Eth* OR Tron OR EOS OR Liquid* OR Algo* OR SLP OR Sol* OR Tether! OR USDT OR drop! OR crash!)	RFP Nos. 4, 5, 21, 59, 61, 62
Audit*	N/A
Back w/5 (tether or USDT)	RFP Nos. 7, 11, 14, 15
Backfill*	N/A
[Name of "Anonymous Trader"]	RFP No. 28
Betts	RFP Nos. 31, 40
Binance	N/A
Bitcointalk*	N/A
(Bitfinex w/5 print*) w/5 Tether	RFP Nos. 4, 61, 62, 64
Bitfinex'ed	N/A
Bitlicense	N/A
Bittrex	RFP Nos. 9, 61, 62, 63, 64, 65
Bjorn w/3 Wolf	N/A
Bloat*	N/A
Blockchain.com	N/A
Blockchain.info*	N/A
Brock	N/A
Brock w/2 Pierce	RFP No. 50
Bubble w/15 (bitcoin OR market OR price)	RFP No. 63
Bybit	N/A
call w/3 (me OR you)	RFP 18, 60
Catastroph* w/15 (Bitcoin OR BTC OR Omni OR Eth* OR Tron OR EOS OR Liquid* OR Algo* OR SLP OR Sol* OR Tether* OR USDT OR drop* OR crash*)	RFP No. 21
CC	N/A
CCC	N/A
CEA	N/A

CFTC	N/A
(Chris w/2 Ellis) AND (Tweet or twitter OR warrant OR subpoena)	RFP No. 49
CoinAPI	N/A
Coinbase	N/A
Coindesk	N/A
CoinDesk*	N/A
Coinmarketcap.com *	N/A
Commingl*	N/A
Commission*	N/A
Conspir* w/10 (Tether* OR USDT)	RFP No. 60
Conspir* and (Bitcoin OR BTC OR Omni OR Eth* OR Tron OR EOS OR Liquid* OR Algo* OR SLP OR Sol*)	RFP No. 21
Control* w/15 (pric* OR BTC OR bitcoin OR flow OR Demand OR Market)	RFP Nos. 21, 22, 23, 24, 25, 72, 74
Control* w/15 Bitfinex w/15 (Tether OR "USDT")	N/A
Crash* w/10 (Tether* OR USDT)	RFP No. 63
Crash* /15 (Bitcoin OR BTC OR Omni OR Eth* OR Tron OR EOS OR Liquid* OR Algo* OR SLP OR Sol*)	RFP No. 63
Crypto.com	N/A
Crypto* w/15 future*	RFP Nos. 12, 17
CryptoCapital	RFP Nos. 10, 27, 30
D'Amico	RFP No. 31
Daniel w/2 Barrs	RFP No. 44
Dash*	N/A
Debas* w/15 (Bitcoin OR BTC OR Omni OR Eth* OR Tron OR EOS OR Liquid* OR Algo* OR SLP OR Sol*)	RFP Nos. 21, 63
Debas* w/10 (Tether* OR USDT)	RFP Nos. 21, 63
Deceit* w/15 (executive* OR CEO OR director* OR CFO OR Velde OR Ardoino OR Devasini OR Warrack OR Bitfinex* OR Potter)	RFP No. 8
Declin* w/10 (Tether* OR USDT)	RFP Nos. 21, 63

Declin* w/15 (Bitcoin OR BTC OR Omni OR Eth* OR Tron OR EOS OR Liquid* OR Algo* OR SLP OR Sol*)	RFP Nos. 21, 63
Defraud*	N/A
Delist*	N/A
Demand* w/10 (Tether* OR USDT)	RFP Nos. 21, 63
Demand* w/15 (Bitcoin OR BTC OR Omni OR Eth* OR Tron OR EOS OR Liquid* OR artificial or appearance)	RFP Nos. 21, 63
Destroy* OR Destruct*	N/A
DFS	N/A
Disconnect* w/15 (Supply OR Demand)	RFP No. 18, 19, 56, 63
disrupt* w/10 (Tether* OR USDT)	RFP No. 18, 19, 56, 63
disrupt* w/15 (Bitcoin OR BTC OR Omni OR Eth* OR Tron OR EOS OR Liquid* OR Algo* OR SLP OR Sol*)	RFP Nos. 21, 63
DOJ	N/A
Downturn* w/10 (Tether* OR USDT)	RFP Nos. 21, 63
Downturn* w/15 (Price OR Demand OR Bitcoin OR BTC OR Omni OR Eth* OR Tron OR EOS OR Liquid* OR Algo* OR SLP OR Sol*)	RFP Nos. 21, 63
Drop* w/10 (Tether* OR USDT)	RFP Nos. 21, 63
Drop* /15 (Price OR Demand OR Bitcoin OR Bitcoin Cash OR BTC OR Omni OR Eth* OR Tron OR EOS OR Liquid* OR Algo* OR SLP OR Sol*)	RFP Nos. 21, 63
Epay* /15 (Bitcoin OR Bitcoin Cash OR BTC OR Omni OR Eth* OR Tron OR EOS OR Liquid* OR Algo* OR SLP OR Sol* OR Tether! OR USDT OR drop! OR crash!)	RFP Nos. 21, 63
Ethereum* AND USDT	RFP Nos. 21, 63
EURT*	RFP Nos. 21, 22, 23
Fals* w/15 (supply OR demand OR signal)	RFP No. 18, 19, 56, 63
Fangorn	RFP No. 47
Fines /15 (regulat* or FTC or "Attorney General" or CFTC)	N/A

Fowler*	RFP No. 10
Fraud* AND USDT	RFP Nos. 7, 11, 14, 15
Freeh w/2 Sporkin	RFP No. 57
FTX	N/A
Gemini	N/A
Gerald w/2 Martinez	N/A
Giancarlo OR Devasini	N/A
Griffin	RFP No. 54
Hack*	N/A
Heisenberg	N/A
https://tether.to/en/tether-update	RFP Nos. 66, 67, 68
https://tether.to/en/transparency	RFP Nos. 66, 67, 68
https://tether.to/faqs/	RFP Nos. 66, 67, 68
Huobi	N/A
Illegal* AND (trad* OR manipul* OR inflat*)	RFP Nos. 18, 63
Indict* AND (Tether* OR USDT)	RFP No. 1
Inflat* AND (Bitcoin OR ether OR crypto*)	RFP Nos. 7, 11, 14, 15
Insufficient w/5 (Tether OR USDT)	RFP Nos. 7, 11, 14, 15
Investigat!	RFP No. 1
IOU	RFP No. 7, 51
Jail	N/A
Kraken	N/A
KuCoin	N/A
Launder*	N/A
Leibowitz	N/A
Litecoin*	N/A
Loan	N/A
Loan AND USDT	RFP Nos. 37, 71
Loan* w/10 (token OR “USDT” OR Tether)	RFP Nos. 37, 71
LOC	N/A
Ludovicus OR Velde	N/A
Manipulat* AND (bitcoin OR ether*) AND USDT	RFP Nos. 18, 63
MC-20-00018*	N/A
Merlin*	N/A
MEXC	N/A

Michael w/2 Novogratz	N/A
Mint* w/15 ("USDT" OR Tether OR token)	RFP Nos. 4, 5, 59, 61, 62
Misrepresent* /15 (asset* OR backing OR reserve OR liquid*)	RFP Nos. 11, 12, 14, 15, 32, 65
Monero*	N/A
Monopol*	RFP No. 67
New w/5 (Tether OR USDT)	RFP Nos. 7, 11, 14, 15
Nocoin*	N/A
OKEx	N/A
Oliver w/2 Camponovo	N/A
Omniexplorer.info *	N/A
One-for-one	RFP Nos. 7, 11, 14, 15
Org* w/5 (chart OR structure)	RFP No. 33
Oz w/2 Yosef	RFP No. 45
Peg* w/5 (Tether OR USDT)	RFP Nos. 4, 5, 59, 61, 62
Pinchas w/2 (Goldshtein OR Goldstein)	No specific RFP
Poloniex	RFP Nos. 9, 61, 62, 63, 64, 65
Ponzi	N/A
Potter	N/A
Print w/3 money	RFP Nos. 4, 5, 59, 61, 62
print* w/5 (Tether or USDT)	RFP Nos. 4, 5, 59, 61, 62
prop* w/3 up*	RFP No. 63
Pump*	RFP No. 63
Purchas* w/5 (Tether OR USDT)	RFP Nos. 4, 5, 59, 61, 62
Realcoin w/15 (equat* OR back* OR equal*) w/25 (dollar* OR bank* OR account* OR fiat OR currenc* OR reserve* OR cash)	RFP No. 7, 14, 31
Reggie OR Reginald OR Fowler	RFP No. 10
Releas* w/5 (Tether OR USDT)	RFP Nos. 4, 5, 59, 61, 62
Reserv* w/15 (cash or liquid or currency or sufficient or insufficient or paper or illiquid)	RFP Nos. 7, 11, 14, 15
Reserv* w/5 (Tether or USDT)	RFP Nos. 7, 11, 14, 15
Roche OR RCF OR RF	N/A
Scam* /15 (USDT or Tether)	N/A
SEC	N/A
Skyrocket*	N/A

(Spike* w/15 (demand or trad* OR price)) w/10 (Tether* OR USDT)	RFP No. 63
(Spike* w/15 (demand or trad* OR price)) w/15 (Bitcoin OR BTC OR Omni OR Eth* OR Tron OR EOS OR Liquid* OR Algo* OR SLP OR Sol* OR Drop* OR Crash*)	RFP No. 63
Suspicious* w/10 (Tether* OR USDT)	RFP No. 63
Suspicious* w/15 (Bitcoin OR BTC OR Omni OR Eth* OR Tron OR EOS OR Liquid* OR Algo* OR SLP OR Sol* OR spike or increase)	RFP No. 63
Tether w/2 (Pull* OR Push*)	N/A
Tether* w/3 ("Bank Account")	N/A
Tetherreport.com *	RFP No. 53
Tokenised or tokenized	N/A
TOPSUN	N/A
Trade* w/5 (Strategy OR Pattern)	RFP Nos. 4, 5, 59, 61, 62
Transfer* w/10 ("USDT" OR Tether OR token)	RFP Nos. 59, 63
Transparen*	N/A
Un-tether*	RFP No. 54
Unauthorize*	N/A
Unback*	RFP Nos. 7, 11, 14, 15
Undisclos* /15 (relationship or connection or tie* or arrangement)	RFP No. 60
Unfund*	RFP Nos. 7, 11, 14, 15
Unilateral*	N/A
Unpredictabl*	N/A
Untether*	RFP No. 54
UpBit	N/A
Wash	N/A
Whalepool*	N/A
XT.com	N/A
Zcash*	N/A

Daniel M. Stone

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From: Greenfield, Elliot <egreenfield@debevoise.com>
Date: Thursday, June 30, 2022 at 3:19 PM
To: Maya Jumper <mjumper@rochefreedman.com>, Tether Litigation
<Tether_Litigation@rochefreedman.com>
Cc: Ceresney, Andrew J. <aceresney@debevoise.com>, Schaper, Michael
<mschaper@debevoise.com>, O'Connor, Maeve <mloconnor@debevoise.com>, Burke, Melanie
<mburke@debevoise.com>, Schlegelmilch, Stephan J <sjschlegelmilch@debevoise.com>,
'sahuja@dmablaws.com' <sahuja@dmablaws.com>, 'cbeal@dmablaws.com'
<cbeal@dmablaws.com>, 'michael@mjllaw.com' <michael@mjllaw.com>, 'Bill Kraus'
<krausw@butzel.com>, Rosh, Samuel <sjrosh@debevoise.com>, Hahn, Ashley V.
<avhahn@debevoise.com>
Subject: RE: In re Tether and Bitfinex Crypto Asset Litig., No. 19-CV-09236

[EXTERNAL SENDER]

Maya,

Please see attached. On our June 22 call, Plaintiffs represented that they would identify the RFP(s) to which each of your proposed search terms is purportedly tied. When can we expect to receive that?

Thanks,
Elliot

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From: Maya Jumper [<mailto:mjumper@rochefreedman.com>]
Sent: Wednesday, June 29, 2022 18:13
To: Greenfield, Elliot; Tether Litigation
Cc: Ceresney, Andrew J.; Schaper, Michael; O'Connor, Maeve; Burke, Melanie; Schlegelmilch, Stephan J;
'sahuja@dmablaws.com'; 'cbeal@dmablaws.com'; 'michael@mjllaw.com'; 'Bill Kraus'; Rosh, Samuel; Hahn,
Ashley V.
Subject: Re: In re Tether and Bitfinex Crypto Asset Litig., No. 19-CV-09236

Elliot,

During the Parties' June 22, 2022 meet and confer, B/T Defendants represented that they would respond to Plaintiffs' June 3 time period proposal (February 1, 2015 through June 5, 2020, for all discovery, with the exception of all documents relating to B/T Defendants' issuance of USDT, including the recipients of USDT and the amounts issued, and USDT backing, reserves, and collateral, which will be produced through the date of collection) and Plaintiffs' custodian proposal with a counterproposal by Friday, June 24 or earlier this week at the latest. We have not received a counterproposal from B/T Defendants on these two topics.

Based on the representations communicated by B/T Defendants during the June 22 meet and confer, Plaintiffs understand the Parties to be at impasse with respect to disputes concerning: i) the time period for B/T Defendants' discovery production and ii) Plaintiffs' proposed custodians. Please let us know by **COB tomorrow (6/30)** if B/T Defendants disagree with Plaintiffs' understanding of the status of the Parties' negotiations on these disputes.

Thanks,

Maya S. Jumper

Associate

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New York, New York 10016
(t) (646) 970-7524
(@) mjumper@rochefreedman.com

From: Maya Jumper <mjumper@rochefreedman.com>

Date: Wednesday, June 15, 2022 at 6:34 PM

To: Greenfield, Elliot <egreenfield@debevoise.com>, Tether Litigation
<Tether_Litigation@rochefreedman.com>

Cc: Ceresney, Andrew J. <aceresney@debevoise.com>, Schaper, Michael
<mschaper@debevoise.com>, O'Connor, Maeve <mloconnor@debevoise.com>, Burke, Melanie
<mburke@debevoise.com>, Schlegelmilch, Stephan J <sjschlegelmilch@debevoise.com>,
'sahuja@dmablaw.com' <sahuja@dmablaw.com>, 'cbeal@dmablaw.com'
<cbeal@dmablaw.com>, 'michael@mjllaw.com' <michael@mjllaw.com>, 'Bill Kraus'
<krausw@butzel.com>, Rosh, Samuel <sjrosh@debevoise.com>, Hahn, Ashley V.
<avhahn@debevoise.com>

Subject: Re: In re Tether and Bitfinex Crypto Asset Litig., No. 19-CV-09236

Thanks, Elliot. We're available on June 22 at 3pm ET. Calendar invite to follow.

Maya S. Jumper

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Roche Freedman LLP
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(t) (646) 970-7524
(@) mjumper@rochefreedman.com

From: Greenfield, Elliot <egreenfield@debevoise.com>

Date: Wednesday, June 15, 2022 at 2:46 PM

To: Maya Jumper <mjumper@rochefreedman.com>, Tether Litigation
<Tether_Litigation@rochefreedman.com>

Cc: Ceresney, Andrew J. <aceresney@debevoise.com>, Schaper, Michael
<mschaper@debevoise.com>, O'Connor, Maeve <mloconnor@debevoise.com>, Burke, Melanie
<mburke@debevoise.com>, Schlegelmilch, Stephan J <sjschlegelmilch@debevoise.com>,
'sahuja@dmabl原因.com' <sahuja@dmabl原因.com>, 'cbeal@dmabl原因.com' <cbeal@dmabl原因.com>,
'michael@mjllaw.com' <michael@mjllaw.com>, 'Bill Kraus' <krausw@butzel.com>,
Rosh, Samuel <sjrosh@debevoise.com>, Hahn, Ashley V. <avhahn@debevoise.com>

Subject: RE: In re Tether and Bitfinex Crypto Asset Litig., No. 19-CV-09236

[EXTERNAL SENDER]

Maya, we are unable to find a time that works for our team tomorrow or Friday, and Monday is a holiday, but we are available anytime in the afternoon on Wednesday, June 22. Just let us know what time works best on your end.

Thanks,
Elliot

**Debevoise
& Plimpton**

Elliot Greenfield
Partner

egreenfield@debevoise.com
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From: Maya Jumper [<mailto:mjumper@rochefreedman.com>]

Sent: Tuesday, June 14, 2022 15:30

To: Greenfield, Elliot; Tether Litigation

Cc: Ceresney, Andrew J.; Schaper, Michael; O'Connor, Maeve; Burke, Melanie; Schlegelmilch, Stephan J; 'sahuja@dmabl原因.com'; 'cbeal@dmabl原因.com'; 'michael@mjllaw.com'; 'Bill Kraus'; Rosh, Samuel; Hahn, Ashley V.

Subject: Re: In re Tether and Bitfinex Crypto Asset Litig., No. 19-CV-09236

Elliot – following up regarding your availability this week.

Thanks,

Maya S. Jumper
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New York, New York 10016

(t) (646) 970-7524
(@) mjumper@rochefreedman.com

From: Greenfield, Elliot <egreenfield@debevoise.com>
Date: Friday, June 10, 2022 at 1:54 PM
To: Maya Jumper <mjumper@rochefreedman.com>, Tether Litigation <Tether_Litigation@rochefreedman.com>
Cc: Ceresney, Andrew J. <aceresney@debevoise.com>, Schaper, Michael <mschaper@debevoise.com>, O'Connor, Maeve <mloconnor@debevoise.com>, Burke, Melanie <mburke@debevoise.com>, Schlegelmilch, Stephan J <sjschlegelmilch@debevoise.com>, 'sahuja@dmablaw.com' <sahuja@dmablaw.com>, 'cbeal@dmablaw.com' <cbeal@dmablaw.com>, 'michael@mjllaw.com' <michael@mjllaw.com>, 'Bill Kraus' <krausw@butzel.com>, Rosh, Samuel <sjrosh@debevoise.com>, Hahn, Ashley V. <avhahn@debevoise.com>
Subject: RE: In re Tether and Bitfinex Crypto Asset Litig., No. 19-CV-09236

[EXTERNAL SENDER]

Maya, we'll compare calendars and get back to you. Thanks.

**Debevoise
& Plimpton**

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From: Maya Jumper [<mailto:mjumper@rochefreedman.com>]
Sent: Thursday, June 09, 2022 15:34
To: Greenfield, Elliot; Tether Litigation
Cc: Ceresney, Andrew J.; Schaper, Michael; O'Connor, Maeve; Burke, Melanie; Schlegelmilch, Stephan J; 'sahuja@dmablaw.com'; 'cbeal@dmablaw.com'; 'michael@mjllaw.com'; 'Bill Kraus'; Rosh, Samuel; Hahn, Ashley V.
Subject: Re: In re Tether and Bitfinex Crypto Asset Litig., No. 19-CV-09236

Elliot,

We would like to schedule another meet and confer next week to discuss outstanding discovery issues. Please let us know your availability.

Thanks,

Maya S. Jumper
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New York, New York 10016
(t) (646) 970-7524
(@) mjumper@rochefreedman.com

From: Maya Jumper <mjumper@rochefreedman.com>

Date: Friday, June 3, 2022 at 8:36 PM

To: Greenfield, Elliot <egreenfield@debevoise.com>, Tether Litigation
<Tether_Litigation@rochefreedman.com>

Cc: Ceresney, Andrew J. <aceresney@debevoise.com>, Schaper, Michael
<mschaper@debevoise.com>, O'Connor, Maeve <mloconnor@debevoise.com>, Burke, Melanie
<mburke@debevoise.com>, Schlegelmilch, Stephan J <sjschlegelmilch@debevoise.com>,
'sahuja@dmablaw.com' <sahuja@dmablaw.com>, 'cbeal@dmablaw.com'
<cbeal@dmablaw.com>, 'michael@mjllaw.com' <michael@mjllaw.com>, 'Bill Kraus'
<krausw@butzel.com>, Rosh, Samuel <sjrosh@debevoise.com>, Hahn, Ashley V.
<avhahn@debevoise.com>

Subject: Re: In re Tether and Bitfinex Crypto Asset Litig., No. 19-CV-09236

Counsel:

Please see attached.

Thanks,

Maya S. Jumper
Associate

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99 Park Avenue, Suite 1910
New York, New York 10016
(t) (646) 970-7524
(@) mjumper@rochefreedman.com

From: Greenfield, Elliot <egreenfield@debevoise.com>

Date: Wednesday, May 18, 2022 at 7:45 PM

To: Maya Jumper <mjumper@rochefreedman.com>, Tether Litigation
<Tether_Litigation@rochefreedman.com>

Cc: Ceresney, Andrew J. <aceresney@debevoise.com>, Schaper, Michael
<mschaper@debevoise.com>, O'Connor, Maeve <mloconnor@debevoise.com>, Burke, Melanie
<mburke@debevoise.com>, Schlegelmilch, Stephan J <sjschlegelmilch@debevoise.com>,
'sahuja@dmablaw.com' <sahuja@dmablaw.com>, 'cbeal@dmablaw.com'
<cbeal@dmablaw.com>, 'michael@mjllaw.com' <michael@mjllaw.com>, 'Bill Kraus'
<krausw@butzel.com>, Rosh, Samuel <sjrosh@debevoise.com>, Hahn, Ashley V.
<avhahn@debevoise.com>

Subject: RE: In re Tether and Bitfinex Crypto Asset Litig., No. 19-CV-09236

[EXTERNAL SENDER]

Counsel,

Following up on our discussion of document custodians, the B/T Defendants do not have organizational charts that contain a complete list of officers and employees. Based on the B/T Defendants' interrogatory responses, they are providing titles and dates of employment for the following individuals:

1. Paolo Ardoino, Chief Technology Officer, 2015-present
2. Julian Arriagada, Compliance Officer, 2018-present
3. Bill Brindise, Head of OTC, 2015-present
4. Adam Chamely, Developer, 2015-present
5. Amy Churchill, Director of Finance, 2018-2022
6. Giancarlo Devasini, Chief Financial Officer, 2015-present
7. Silvano Di Stefano, Chief Investment Officer, 2019-present
8. Stuart Hoegner, General Counsel, 2015-present
9. John Kloosterman, Head of Banking, 2015-present
10. Grzegorz Opalinski, Middle & Back Office Services Manager, 2020-present
11. Phil Potter, Chief Strategy Officer of Bitfinex, 2015-2018
12. Leonardo Real, Chief Compliance Officer, 2018-present
13. Craig Sellers, Co-Founder & former CTO, 2014-2016
14. Ludovicus Jan van der Velde, Chief Executive Officer, 2015-present

Thanks,
Elliot

**Debevoise
& Plimpton**

Elliot Greenfield
Partner

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From: Greenfield, Elliot
Sent: Tuesday, May 17, 2022 19:27
To: 'Maya Jumper'; Tether Litigation
Cc: Ceresney, Andrew J.; Schaper, Michael; O'Connor, Maeve; Burke, Melanie; Schlegelmilch, Stephan J; 'sahuja@dmablaw.com'; 'cbeal@dmablaw.com'; 'michael@mjlaw.com'; 'Bill Kraus'
Subject: RE: In re Tether and Bitfinex Crypto Asset Litig., No. 19-CV-09236

Please see attached.

Thanks,
Elliot

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From: Maya Jumper [<mailto:mjumper@rochefreedman.com>]

Sent: Monday, May 16, 2022 13:51

To: Greenfield, Elliot; Tether Litigation

Cc: Ceresney, Andrew J.; Schaper, Michael; O'Connor, Maeve; Burke, Melanie; Schlegelmilch, Stephan J; 'sahuja@dmablaw.com'; 'cbeal@dmablaw.com'; 'michael@mjllaw.com'; 'Bill Kraus'

Subject: Re: In re Tether and Bitfinex Crypto Asset Litig., No. 19-CV-09236

Elliot,

We are available to meet and confer this Thursday, May 19 at noon ET regarding any remaining disputes from the parties' May 11 meet and confer.

During the May 11 meet and confer, counsel stated that B/T Defendants intended to respond with a counterproposal to several revised RFPs included in Plaintiffs' May 6 letter. Please let us know if we can expect to receive that prior to the next meet and confer.

Thanks,

Maya S. Jumper

Associate

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99 Park Avenue, Suite 1910

New York, New York 10016

(t) (646) 970-7524

(@) mjumper@rochefreedman.com

From: Greenfield, Elliot <egreenfield@debevoise.com>

Date: Monday, May 9, 2022 at 5:17 PM

To: Maya Jumper <mjumper@rochefreedman.com>, Tether Litigation

<Tether_Litigation@rochefreedman.com>

Cc: Ceresney, Andrew J. <aceresney@debevoise.com>, Schaper, Michael

<mschaper@debevoise.com>, O'Connor, Maeve <mloconnor@debevoise.com>, Burke, Melanie

<mburke@debevoise.com>, Schlegelmilch, Stephan J <sjschlegelmilch@debevoise.com>,

'sahuja@dmablaw.com' <sahuja@dmablaw.com>, 'cbeal@dmablaw.com'

<cbeal@dmablaw.com>, 'michael@mjllaw.com' <michael@mjllaw.com>, 'Bill Kraus'

<krausw@butzel.com>

Subject: RE: In re Tether and Bitfinex Crypto Asset Litig., No. 19-CV-09236

[EXTERNAL SENDER]

Please see the attached letter.

Thanks,
Elliot

**Debevoise
& Plimpton**

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From: Maya Jumper [<mailto:mjumper@rochefreedman.com>]
Sent: Friday, May 06, 2022 19:42
To: Greenfield, Elliot; Tether Litigation
Cc: Ceresney, Andrew J.; Schaper, Michael; O'Connor, Maeve; Burke, Melanie; Schlegelmilch, Stephan J; 'sahuja@dmablaw.com'; 'cbeal@dmablaw.com'; 'michael@mjllaw.com'; 'Bill Kraus'
Subject: Re: In re Tether and Bitfinex Crypto Asset Litig., No. 19-CV-09236

Elliot,

Please see the attached correspondence.

Maya S. Jumper
Associate

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From: Greenfield, Elliot <egreenfield@debevoise.com>
Date: Monday, May 2, 2022 at 11:27 AM
To: Maya Jumper <mjumper@rochefreedman.com>, Tether Litigation
<Tether_Litigation@rochefreedman.com>
Cc: Ceresney, Andrew J. <aceresney@debevoise.com>, Schaper, Michael
<mschaper@debevoise.com>, O'Connor, Maeve <mloconnor@debevoise.com>, Burke, Melanie
<mburke@debevoise.com>, Schlegelmilch, Stephan J <sjschlegelmilch@debevoise.com>,
'sahuja@dmablaw.com' <sahuja@dmablaw.com>, 'cbeal@dmablaw.com'
<cbeal@dmablaw.com>, 'michael@mjllaw.com' <michael@mjllaw.com>, 'Bill Kraus'
<krausw@butzel.com>
Subject: RE: In re Tether and Bitfinex Crypto Asset Litig., No. 19-CV-09236

[EXTERNAL SENDER]

Thanks.

**Debevoise
& Plimpton**

Elliot Greenfield
Partner

egreenfield@debevoise.com
+1 212 909 6772 (Tel)

919 Third Avenue
New York, NY 10022
www.debevoise.com

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From: Maya Jumper [<mailto:mjumper@rochefreedman.com>]

Sent: Monday, May 02, 2022 11:20

To: Greenfield, Elliot; Tether Litigation

Cc: Ceresney, Andrew J.; Schaper, Michael; O'Connor, Maeve; Burke, Melanie; Schlegelmilch, Stephan J; 'sahuja@dmablaw.com'; 'cbeal@dmablaw.com'; 'michael@mjllaw.com'; 'Bill Kraus'

Subject: Re: In re Tether and Bitfinex Crypto Asset Litig., No. 19-CV-09236

Elliot,

That works for us. We'll circulate an invite shortly.

Maya S. Jumper

Associate

Roche Freedman LLP
99 Park Avenue, Suite 1910
New York, New York 10016
(t) (646) 970-7524
(@) mjumper@rochefreedman.com

From: Greenfield, Elliot <egreenfield@debevoise.com>

Date: Sunday, May 1, 2022 at 11:46 AM

To: Maya Jumper <mjumper@rochefreedman.com>, Tether Litigation
<Tether_Litigation@rochefreedman.com>

Cc: Ceresney, Andrew J. <aceresney@debevoise.com>, Schaper, Michael
<mschaper@debevoise.com>, O'Connor, Maeve <mloconnor@debevoise.com>, Burke, Melanie
<mburke@debevoise.com>, Schlegelmilch, Stephan J <sjschlegelmilch@debevoise.com>,
'sahuja@dmablaw.com' <sahuja@dmablaw.com>, 'cbeal@dmablaw.com'
<cbeal@dmablaw.com>, 'michael@mjllaw.com' <michael@mjllaw.com>, 'Bill Kraus'
<krausw@butzel.com>

Subject: RE: In re Tether and Bitfinex Crypto Asset Litig., No. 19-CV-09236

[EXTERNAL SENDER]

Maya, does Wednesday, May 11 at 12:30pm ET work on your end? Thanks.



Elliot Greenfield
Partner

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From: Maya Jumper [<mailto:mjumper@rochefreedman.com>]

Sent: Thursday, April 28, 2022 17:47

To: Greenfield, Elliot; Tether Litigation

Cc: Ceresney, Andrew J.; Schaper, Michael; O'Connor, Maeve; Burke, Melanie; Schlegelmilch, Stephan J; 'sahuja@dmablaw.com'; 'cbeal@dmablaw.com'; 'michael@mjllaw.com'; 'Bill Kraus'

Subject: Re: In re Tether and Bitfinex Crypto Asset Litig., No. 19-CV-09236

Elliot,

We will provide a written response to your letter shortly along with two sets of proposed search terms to be run by Plaintiffs and B/T Defendants, respectively.

In the meantime, we'd like to schedule a third meet and confer for the week of May 9-13. Can you propose some dates that work on your end?

Thanks,

Maya S. Jumper
Associate

Roche Freedman LLP
99 Park Avenue, Suite 1910
New York, New York 10016
(t) (646) 970-7524
(@) mjumper@rochefreedman.com

From: Greenfield, Elliot <egreenfield@debevoise.com>

Date: Thursday, April 28, 2022 at 10:54 AM

To: Maya Jumper <mjumper@rochefreedman.com>, Tether Litigation
<Tether_Litigation@rochefreedman.com>

Cc: Ceresney, Andrew J. <aceresney@debevoise.com>, Schaper, Michael
<mschaper@debevoise.com>, O'Connor, Maeve <mloconnor@debevoise.com>, Burke, Melanie
<mburke@debevoise.com>, Schlegelmilch, Stephan J <sjschlegelmilch@debevoise.com>,
'sahuja@dmablaw.com' <sahuja@dmablaw.com>, 'cbeal@dmablaw.com'
<cbeal@dmablaw.com>, 'michael@mjllaw.com' <michael@mjllaw.com>, 'Bill Kraus'
<krausw@butzel.com>

Subject: RE: In re Tether and Bitfinex Crypto Asset Litig., No. 19-CV-09236

[EXTERNAL SENDER]

Please see the attached letter.

Thanks,
Elliot

**Debevoise
& Plimpton**

Elliot Greenfield
Partner

egreenfield@debevoise.com
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New York, NY 10022
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From: Greenfield, Elliot
Sent: Sunday, April 10, 2022 20:55
To: 'Maya Jumper'; Tether Litigation
Cc: Ceresney, Andrew J.; Schaper, Michael; O'Connor, Maeve; Burke, Melanie; Schlegelmilch, Stephan J; sahuja@dmablaw.com; cbeal@dmablaw.com; michael@mjllaw.com; Bill Kraus
Subject: RE: In re Tether and Bitfinex Crypto Asset Litig., No. 19-CV-09236

Counsel,

Following up on our call on Friday, please see the following webpage on the Tether website: <https://tether.to/en/tether-issuance-primer/>. It explains the processes of authorization, issuance, redemption and destruction, as well as how those stages relate to Tether reserves. As discussed, we hope this clarifies the applicable terminology and allows you to clarify, revise or withdraw certain of Plaintiffs' RFPs.

Thanks,
Elliot

**Debevoise
& Plimpton**

Elliot Greenfield
Partner

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message in your reply) and by telephone (you may call us collect in New York at 1-212-909-6000) and then delete and discard all copies of the e-mail. Thank you.

From: Maya Jumper [mailto:mjumper@rochefreedman.com]

Sent: Monday, April 04, 2022 21:06

To: Greenfield, Elliot

Cc: Ceresney, Andrew J.; Schaper, Michael; O'Connor, Maeve; Burke, Melanie; Schlegelmilch, Stephan J; sahuja@dmablaw.com; cbeal@dmablaw.com; michael@mjllaw.com; Bill Kraus; Tether Litigation

Subject: Re: In re Tether and Bitfinex Crypto Asset Litig., No. 19-CV-09236

We've made arrangements on our end to make 1pm ET on Friday work. An invite will be circulated shortly.

Maya S. Jumper

Associate

Roche Freedman LLP

99 Park Avenue, Suite 1910

New York, New York 10016

(t) (646) 970-7524

(@) mjumper@rochefreedman.com

From: Greenfield, Elliot <egreenfield@debevoise.com>

Date: Monday, April 4, 2022 at 6:53 PM

To: Maya Jumper <mjumper@rochefreedman.com>

Cc: Ceresney, Andrew J. <aceresney@debevoise.com>, Schaper, Michael <mschaper@debevoise.com>, O'Connor, Maeve <mloconnor@debevoise.com>, Burke, Melanie <mburke@debevoise.com>, Schlegelmilch, Stephan J <sjschlegelmilch@debevoise.com>, sahuja@dmablaw.com <sahuja@dmablaw.com>, cbeal@dmablaw.com <cbeal@dmablaw.com>, michael@mjllaw.com <michael@mjllaw.com>, Bill Kraus <krausw@butzel.com>, Tether Litigation <Tether_Litigation@rochefreedman.com>

Subject: Re: In re Tether and Bitfinex Crypto Asset Litig., No. 19-CV-09236

[EXTERNAL SENDER]

Any later? Some of our group is on Pacific time?

Sent from my iPhone

On Apr 4, 2022, at 6:51 PM, Maya Jumper <mjumper@rochefreedman.com> wrote:

10am on Friday works on our end.

Maya S. Jumper

Associate

Roche Freedman LLP

99 Park Avenue, Suite 1910

New York, New York 10016

(t) (646) 970-7524

(@) mjumper@rochefreedman.com

From: Greenfield, Elliot <egreenfield@debevoise.com>
Date: Monday, April 4, 2022 at 5:45 PM
To: Maya Jumper <mjumper@rochefreedman.com>, Ceresney, Andrew J. <aceresney@debevoise.com>, Schaper, Michael <mschaper@debevoise.com>, O'Connor, Maeve <mloconnor@debevoise.com>, Burke, Melanie <mburke@debevoise.com>, Schlegelmilch, Stephan J <sjschlegelmilch@debevoise.com>, sahuja@dmablaw.com <sahuja@dmablaw.com>, cbeal@dmablaw.com <cbeal@dmablaw.com>, michael@mjlalaw.com <michael@mjlalaw.com>, 'Bill Kraus' <krausw@butzel.com>
Cc: Tether Litigation <Tether_Litigation@rochefreedman.com>
Subject: RE: In re Tether and Bitfinex Crypto Asset Litig., No. 19-CV-09236

[EXTERNAL SENDER]

I'm away all next week. Is there another time on Friday that works for you?

**Debevoise
& Plimpton**

Elliot Greenfield
Partner

egreenfield@debevoise.com
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www.debevoise.com

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From: Maya Jumper [mailto:mjumper@rochefreedman.com]
Sent: Monday, April 04, 2022 17:36
To: Greenfield, Elliot; Ceresney, Andrew J.; Schaper, Michael; O'Connor, Maeve; Burke, Melanie; Schlegelmilch, Stephan J; sahuja@dmablaw.com; cbeal@dmablaw.com; michael@mjlalaw.com; 'Bill Kraus'
Cc: Tether Litigation
Subject: Re: In re Tether and Bitfinex Crypto Asset Litig., No. 19-CV-09236

Unfortunately, Friday at 1pm doesn't work on our end. Are you available on Monday, April 11 between noon-4pm?

Thanks,

Maya S. Jumper
Associate

Roche Freedman LLP
99 Park Avenue, Suite 1910
New York, New York 10016
(t) (646) 970-7524
(@) mjumper@rochefreedman.com

From: Greenfield, Elliot <egreenfield@debevoise.com>
Date: Monday, April 4, 2022 at 3:47 PM
To: Maya Jumper <mjumper@rochefreedman.com>, Ceresney, Andrew J. <aceresney@debevoise.com>, Schaper, Michael <mschaper@debevoise.com>, O'Connor, Maeve <mloconnor@debevoise.com>, Burke, Melanie <mburke@debevoise.com>, Schlegelmilch, Stephan J <sjschlegelmilch@debevoise.com>, sahuja@dmablaw.com <sahuja@dmablaw.com>, cbeal@dmablaw.com <cbeal@dmablaw.com>, michael@mjllaw.com <michael@mjllaw.com>, 'Bill Kraus' <krausw@butzel.com>
Cc: Tether Litigation <Tether_Litigation@rochefreedman.com>
Subject: RE: In re Tether and Bitfinex Crypto Asset Litig., No. 19-CV-09236

[EXTERNAL SENDER]

Maya, we are free on Friday at 1pm if that works on your end. Thanks.

**Debevoise
& Plimpton**

Elliot Greenfield
Partner

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From: Maya Jumper [<mailto:mjumper@rochefreedman.com>]
Sent: Monday, April 04, 2022 13:05
To: Greenfield, Elliot; Ceresney, Andrew J.; Schaper, Michael; O'Connor, Maeve; Burke, Melanie; Schlegelmilch, Stephan J; sahuja@dmablaw.com; cbeal@dmablaw.com; michael@mjllaw.com; 'Bill Kraus'
Cc: Tether Litigation
Subject: Re: In re Tether and Bitfinex Crypto Asset Litig., No. 19-CV-09236

Elliot,

Thanks for a productive initial discussion last week. Please provide your availability for a call to discuss the remaining topics from the March 31 meet and confer.

Best,

Maya S. Jumper
Associate

Roche Freedman LLP
99 Park Avenue, Suite 1910

New York, New York 10016
(t) (646) 970-7524
(@) m jumper@rochefreedman.com

From: Greenfield, Elliot <egreenfield@debevoise.com>
Date: Tuesday, March 29, 2022 at 6:26 PM
To: Maya Jumper <m jumper@rochefreedman.com>, Ceresney, Andrew J. <aceresney@debevoise.com>, Schaper, Michael <mschaper@debevoise.com>, O'Connor, Maeve <mloconnor@debevoise.com>, Burke, Melanie <mburke@debevoise.com>, Schlegelmilch, Stephan J <sjschlegelmilch@debevoise.com>, sahuja@dmablaw.com <sahuja@dmablaw.com>, cbeal@dmablaw.com <cbeal@dmablaw.com>, michael@mjllaw.com <michael@mjllaw.com>, 'Bill Kraus' <krausw@butzel.com>
Cc: Tether Litigation <Tether_Litigation@rochefreedman.com>
Subject: RE: In re Tether and Bitfinex Crypto Asset Litig., No. 19-CV-09236

[EXTERNAL SENDER]

Please see the attached letter. We look forward to speaking on Thursday.

Thanks,
Elliot

**Debevoise
& Plimpton**

Elliot Greenfield
Partner

egreenfield@debevoise.com
+1 212 909 6772 (Tel)

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From: Maya Jumper [mailto:m jumper@rochefreedman.com]
Sent: Tuesday, March 22, 2022 15:17
To: Ceresney, Andrew J.; Greenfield, Elliot; Schaper, Michael; O'Connor, Maeve; Burke, Melanie; Schlegelmilch, Stephan J; sahuja@dmablaw.com; cbeal@dmablaw.com; michael@mjllaw.com
Cc: Tether Litigation
Subject: In re Tether and Bitfinex Crypto Asset Litig., No. 19-CV-09236

Counsel:

Please see the attached correspondence.

Regards,

Maya Jumper

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